

UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF NEW YORK

EASTERN PROFIT CORPORATION )  
LIMITED )  
Plaintiff, )  
v. )  
STRATEGIC VISION US, LLC )  
Defendant. )  
Case No. 18-CV-2185 (LJL)

**PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Federal Rule of Civil Procedure 56, Plaintiff Eastern Profit Corporation Limited (“Eastern”) respectfully moves for summary judgment in its favor and against Defendant Strategic Vision US, LLC (“Strategic”) on the following claims and counterclaims:

- Count III of Eastern’s Second Amended Complaint (Dkt. No. 93 ¶¶ 46-107);
- Count IV of Eastern’s Second Amended Complaint (Dkt. No. 93 ¶¶ 108-113);
- Count I of Strategic’s Counterclaims (Dkt. No. 127 ¶¶ 89-104); and
- Count II of Strategic’s Counterclaims (Dkt. No. 127 ¶¶ 105-116).

The grounds for this motion are set forth in Eastern's Memorandum of Law in Support of its Motion for Summary Judgment, which has been filed contemporaneously herewith.

Dated: March 16, 2020

OF COUNSEL:

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Respectfully submitted,

*/s/ Francis J. Lawall*

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of March, 2020, a true and correct copy of the foregoing *Plaintiff's Motion for Summary Judgment* was filed electronically. Notice of this filing will be sent to all registered parties by operation of the Court's electronic filing system.

Dated: March 16, 2020

Respectfully submitted,

OF COUNSEL:

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